



June 27, 2025

Hon. Ona T. Wang  
Magistrate Judge  
500 Pearl St.  
New York, NY 10007

**Re: *New York Legal Assistance Group v. Social Security Administration*, No. 23 Civ. 9363**

Dear Judge Wang:

Plaintiff New York Legal Assistance Group (“NYLAG”) writes pursuant to the Court’s June 2, 2025, order, ECF No. 62, directing the Parties to provide a status letter by June 30, 2025.

In the last month, the Parties have made substantial progress towards resolution of this matter. By way of background, this case involves two categories of “programmatic” disputes: claims regarding SSA’s proactive disclosure requirements under the Freedom of Information Act (Claim 5), and claims regarding SSA’s policies and practices of granting or denying fee waivers under the Act. As of this writing, the Parties have mutually resolved the first category, pertaining to the proactive disclosure requirement. The Parties are submitting a Stipulation of Settlement regarding this claim (Claim 5) to the Court to be so ordered contemporaneously with this status letter.

The Parties are now turning their attention to the claims regarding fee waivers and are discussing the possibility of resolving these claims as well. Accordingly, at this time, the Parties are not prepared to request a briefing schedule on any claim. The Parties respectfully request leave to file another status letter with the Court on or before July 31, 2025.

Respectfully submitted,

/s/Kate Fetrow  
Danielle Tarantolo  
Kate Fetrow  
New York Legal Assistance Group  
*Counsel for Plaintiff*